



February 6, 2006

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: KPN International Network Services, Inc. d/b/a KPN-INS, Inc.  
Certification of CPNI Filing (2-6-06)  
EB Docket No. 06-36  
EB-06-TC-060

Dear Ms. Dortch:

Pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006<sup>1</sup> and the Commission rules concerning the protection of the privacy of customer proprietary network information ("CPNI") by telecommunications carriers,<sup>2</sup> KPN International Network Services, Inc. d/b/a KPN-INS, Inc. (the "Company") submits this Compliance Statement and Certificate. The Company is a wholesale carrier's carrier and does not serve any end users directly. It therefore has no knowledge of end user CPNI except insofar as it has call completion information that it uses to bill its carrier customers – it does not have any CPNI information that would allow it to know the identity or any other personally identifiable information about the end users whose calls it carries for other carriers. Nevertheless, protecting even this limited end user CPNI, and the proprietary information of its carrier customers, is an important obligation for all telecommunications carriers and the Company adopted various operational procedures to assure that, consistent with the Commission's rules, all of the CPNI that it holds is protected from unauthorized and illegal use, access and disclosure.

I am an officer of the Company and based upon my personal knowledge I certify that the following statement describes the operational procedures and policies implemented by the Company to protect the privacy of its customers' CPNI consistent with Commission's CPNI rules.

The Company is a competitive telecommunications carrier providing services in New York. Specifically, the Company provides international switched wholesale services to other U.S. carriers.

---

<sup>1</sup> *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, WC Docket No. 05-196, Public Notice, DA 06-223 (rel. Jan. 30, 2006) ("Public Notice").

<sup>2</sup> 47 C.F.R. § 64.2001, *et seq.*



Consistent with the CPNI rules, the Company may use CPNI to bill and collect for services rendered and to protect rights or property of the Company, other users or other carriers from unlawful use. The Company does not use, disclose or permit access to CPNI for marketing purposes, other than for the purpose of providing service offerings for the type of services to which the carrier customer already subscribes. Furthermore, the Company does not share, sell, lease and otherwise provide CPNI to any of its affiliates, suppliers, vendors and any other third parties for the purposes of marketing any services. Sharing, selling, leasing or otherwise providing CPNI to any unrelated third parties is strictly prohibited by the Company and the Company has no existing plans to share this information with unrelated third parties.

All Company employees are required to abide by the Company's Employee Handbook, which requires employees to maintain the confidentiality of all information, including CPNI, that is obtained as result of their employment by the Company. Employees who violate the Company's policies regarding confidentiality of any Company data, including CPNI, will be terminated. Although the Company has never received any complaint from a customer that it has misused CPNI in any fashion, in an abundance of caution and in light of the recent reports about other carriers that have released sensitive, personal subscriber information to third parties, the Company is currently auditing all of its training and discipline policies and procedures relating to the use of CPNI by Company employees. In the event the Company determines that Company employees require more training in order to protect CPNI, the Company will update its training processes and other procedures as necessary.

The Company does not engage in any sales and marketing campaigns that involve any use of end user CPNI. We are strictly a carrier-to-carrier provider and do not and will not use any end user specific data in any of our commercial or marketing deliberations.

Respectfully submitted,



Feddo Hazewindus

President  
KPN International Network Services, Inc.  
d/b/a KPN-INS, Inc.

cc: Bryon McKoy via e-mail: [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)  
Best Copy and Printing via e-mail [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)